

Harris County Comments (6/23/11)

Draft Addendum 2 to the Soil Sampling and Analysis Plan (SAP) for Residential Soil Sampling, San Jacinto River Waste Pits Superfund Site

Analysis of Existing Information and Selection of Soil Analytes

- Possibly remove unnecessary language.
- The number of samples collected in total is not indicated.

Data Quality Objectives

- It is stated that people living near this section of the San Jacinto River could potentially be exposed to dioxins and furans in soil via direct contact with soils (ingestion and dermal) or inhalation of airborne particulates if dioxins and furans originating from within the 1966 impoundment perimeter have been transported to soils in the floodplain. Does this account for planting of gardens that would be consumed? Research has indicated that dioxin is taken up in the soil in small amounts.

Sampling Objective

- The depth of soil at which human exposures may occur in residential areas is a bullet listed under the residential soil sampling design. Also stated that the objective of sampling is to address the uncertainty at a soil depth that could potentially lead to exposure in residential areas. **These statements are unclear. Please restate.**

Analytical Approach

- Figure 1: The residential areas are not notated well on the map and said map is not labeled to identify its usage.

Sample Locations and Depth

- It is stated that four aliquots from each sampled residence will be composited into a single sample from the residence. Is the four aliquot sample mentioned here the “composite homogenized” sample spoken of on page 5 (see underlined verbiage). For each of these, the full depth interval will be homogenized prior to removing aliquots for each analysis. **These statements are unclear. Please explain and/or restate.**
- Only the composite of soils collected from 0 to 6 inches will be analyzed for dioxins and furans; other samples will be archived. Two points here. 1) Why is the 0-6 inches the only depth analyzed? 2) More of a description of what would trigger a future analysis of the archived aliquot.

Figure 1 & Figure 2

- Title/Identifier for this map is missing. Also the legend does not specify the information that the verbiage references on this map.